

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LEADENHALL CAPITAL PARTNERS LLP
and LEADENHALL LIFE INSURANCE
LINKED INVESTMENTS FUND PLC,

Plaintiffs,

vs.

JOSH WANDER, STEVEN PASKO,
KENNETH KING, 777 PARTNERS LLC,
600 PARTNERS LLC, SPLCSS III LLC,
SIGNAL SML 4 LLC, INSURETY AGENCY
SERVICES LLC, DORCHESTER
RECEIVABLES II LLC, SUTTONPARK
CAPITAL LLC, SIGNAL MEDICAL
RECEIVABLES LLC, INSURETY CAPITAL
LLC, SUTTONPARK SERVICING LLC,
SIGNAL SERVICING LLC, INSURETY
SERVICING LLC, and ADVANTAGE
CAPITAL HOLDINGS LLC,

Defendants.

Civil Action No. 1:24-cv-03453 (JGK)

Notice of Motion

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, Defendant Josh Wander will move this Court, before the Honorable John G. Koeltl, at the United States Court House, 500 Pearl Street, New York, New York 10007, at a date and time to be set by the Court, for an Order (i) pursuant to Federal Rule of Civil Procedure 12(b)(2), to dismiss the complaint for lack of personal jurisdiction, (ii) pursuant to Federal Rule of Civil Procedure 12(b)(1), to dismiss the complaint for lack of subject matter jurisdiction, (iii) pursuant to Federal Rule of Civil Procedure 12(b)(6), to dismiss the complaint for failure to state a claim, and (iv) granting such other and further relief as the Court deems just and proper, including costs and disbursements.

Dated: New York, New York
August 9, 2024

KRAMER LEVIN NAFTALIS & FRANKEL LLP
By: /s/ Jordan Estes

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